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April 2, 2012 - VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

Re: Public Comment on Lifeline and Link Up Reform and Modernization, Advancing Broadband Availability Through Digital Literacy Training
(Document ID FCC-2012-0072-0002)

Dear Ms. Dortch,

OneCommunity is writing in response to the request for public comment on the Lifeline and Link Up Reform and Modernization, Advancing Broadband Availability Through Digital Literacy Training. Our comments are addressed specifically to the following issue:

- 6. To support broadband adoption, the FNPRM seeks comment on dedicating a certain amount of USF funding for four years to support formal digital literacy training for consumers at libraries and schools across the United States.*

We can summarize our comments on this issue as:

- We strongly support the dedication of USF funds for digital literacy training in support of broadband adoption.
- Based on our extensive and recent experience in community-based digital literacy training it is recommended that the Commission leverage the whole ecology of community-based digital literacy programs and providers that encompasses schools and libraries, community partners, and anchor institutions.
- The Commission should design digital literacy training based on new data and subject matter expertise that is available from the first round of National Telecommunications

and Information Administration's *Broadband Technologies Opportunities Program* grants.

- The inclusion of digital literacy training as a component of the Lifeline and Link Up programs presents an opportunity to reinforce, strengthen and link existing K-12- and parent-focused federal programs and initiatives
- Investment in digital literacy in any sector or focused on any constituency, has a multiplying effect for all other sectors, leading to smart, connected communities with broadband literate citizens and a myriad of positive outcomes.

OneCommunity is a non-profit broadband provider located in Cleveland, Ohio. The mission of OneCommunity is to expand high-speed broadband access and adoption to strengthen our region's economy. Our vision is that advanced digital capabilities and effective use of technology will help transform Northeast Ohio and establish the region as a national hub for innovation and economic growth. OneCommunity operates one of the largest and fastest fiber-optic broadband networks in the world. In 2010, OneCommunity was a recipient of two ARRA federal stimulus grants. The first, a Comprehensive Community Infrastructure grant, was awarded to build a seamless, open and neutral network that optimizes middle-mile services. Upon completion in 2013, the OneCommunity network will connect and serve more than 2,000 institutional subscribers and community anchor institutions.

In March 2010, OneCommunity was named the prime recipient of an \$18.7 million Sustainable Broadband Adoption grant from the Broadband Technology Opportunities Program. This grant supports a \$23.5 million initiative called the Connect Your Community (CYC). CYC is a collaborative effort with local nonprofit partners in eight diverse communities to assist 26,000+ disadvantaged adults to become effective broadband adopters.

Our partner communities include Cleveland, Akron and Lorain County in Northeast Ohio; a group of rural counties in East Central Ohio; Detroit, MI; Lexington, KY; Winston-Salem, NC; and Manatee County, FL. Our partners in these communities include neighborhood housing, development and social service organizations, urban leagues, community colleges, and community workforce training programs. These organizations currently employ more than 90 full-time CYC project staff, and have mobilized more than 35,000 documented volunteer hours in support of their efforts.

The first CYC training classes were launched in September 2010. In the ensuing 18 months our 15 nonprofit partners have conducted CYC training in more than 250 community sites, including community centers, church halls, housing estates, schools, libraries, and workplaces. To date the project has provided training to more than 26,000 individuals, and documented broadband adoption by more than 20,000 of them.

Most of these adopters have been provided with donated and/or subsidized refurbished computers. While the large majority have signed up for conventional retail broadband services, more than 1,000 are accessing the Internet through extra-affordable programs such as AT&T Access All, Comcast Internet Essentials, Mobile Citizen, a special half-price offering from Bright House in Manatee County, and a dedicated community WiMax system in collaboration with CLEAR in Detroit.

Making the Case for Digital Literacy Training

Based on research, emerging evidence and our experiences we advocate for continuing to invest in Digital Literacy Training. OneCommunity's CYC Project is particularly relevant to the Commission's interest in the subject of digital literacy training because the scope and reach of the project has proven to be significant and impactful. Providing direct training and broadband adoption assistance to 26,000 low income adults over two years, demonstrates the capacity for a program like this to scale.

The CYC Project has been implemented in a wide variety of communities, from Detroit neighborhoods to Appalachian Ohio villages, by a diverse group of community-based partners, who adapt a common program approach to meet the needs of their local constituents and circumstances. Each of our community partners has faced specific local challenges and opportunities with finding affordable home broadband alternatives for CYC Program participants in their local markets, and finding sources of affordable home computer hardware.

Building on FCC research and reinforced by our on-the-ground experiences, the barriers to broadband adoption, other than price, vary widely. Older workers and very poor young adults with major education and employment deficits are essentially computer- and Internet-illiterate and would benefit from basic computer and digital literacy training. Increased broadband adoption also accelerates interest in high-value Internet uses (job search, parent/school engagement, healthcare support) by currently disconnected households, creating a need for content-specific training to ensure that adopters can access and leverage broadband-enabled educational supports, health information, and employment resources.

It should also be noted that our digital literacy training has served as a gateway to formal learning opportunities for our sustainable broadband adopters, many of whom have continued or broadened their computer training at local community colleges and technical schools. We also have evidence that digital literacy training has improved many of our working SBAs' computer skills, opening up pathways to new positions and allowing some to receive promotions or raises due to their new computer competencies.

To assist the FCC in weighing value, impact and return on investment that digital literacy training could yield, there will soon be an unprecedented amount of new data available for analysis. OneCommunity, CFY (New York), Technology Goes Home (Boston), Chicago SMART Communities (Chicago), and other BTOP Round 1 Sustainable Broadband Adoption projects, can contribute data, feedback, and grassroots knowledge for the FCC to include in its deliberations. This recommendation aligns with proposals made in the National Broadband Plan to establish a clearing house and data warehouse to promote best practices and information sharingⁱ.

Training for members of the public at large

Should training rely on libraries and schools to provide large-scale broadband adopter training?

For a variety of good reasons, K-12 schools seldom undertake this role except (to a limited extent) as physical hosts for training provided by outside programs. Libraries' capacity for this role varies, but in many cases they fill the role aggressively and well. Local branches' space and equipment capacities are already heavily strained. In many communities, these institutions' training and access efforts are part of an ecology that also includes computer training centers (CTC), public computing centers (PCC) and learning centers sponsored by development groups, social service centers, churches, and other organizations. The FCC could rely on libraries to support more training only if significant new financial supports are available. The FCC should also recognize the critical role of other community-based programs in many communities' technology training ecologies.

Training for K-12 parents

The inclusion of digital literacy training as a component of the Lifeline and Link Up programs presents an opportunity to reinforce, strengthen and link existing parent- and student-focused federal programs and initiatives.

- Changes to the Universal Service Fund's e-Rate program provide an opportunity for after-hours use of school facilities and instructional computing infrastructure for digital literacy trainingⁱⁱ.
- Title I, Part A of the Elementary and Secondary Education Act, which targets schools with populations of underserved students, requires that each school conduct "*parent involvement*" activities to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate, to foster parental involvementⁱⁱⁱ.

- The Department of Education's Promise Neighborhood Grant supports community efforts to *"Build a complete continuum of cradle-to-career solutions of both educational programs and family and community supports, with great schools at the center"*^{iv}
- The FCC sponsored *"Connect to Compete"* initiative provides low-cost home broadband solutions and computers for families whose children qualify for the free National School Lunch Program^v.

The combined opportunity of these programs and initiatives enables the school to be the focal point for parent digital literacy training, with resulting improvements in school-parent communication, community engagement, and affordable home broadband connectivity. OneCommunity has developed several working models of this type of school/community collaboration with our local coordinating agencies, school districts' family and community engagement teams, and community partners. The result has enabled school district-aligned, parent focused digital literacy training, with curriculum^{vi} aligned to outcomes that reinforce and foster:

- Parents supporting their child's instructional growth through the use of the district's online instructional resources
- Parents leveraging the district's online resources for improving communication and information acquisition
- Parents' awareness and use of online social services and supports
- The combination of all of these to enable the parent to be an advocate for their child's education

Evaluation of these programs, which are being implemented with local variation in Cleveland, Akron, Detroit, Winston-Salem and Manatee County show promising results and demonstrate the opportunities and impacts that multi-programmatic alignments and digital literacy trainings offer.

Beyond parents and education institutions, the benefits of digital literacy training are overlapping and impactful across all verticals and sectors. As an organization, OneCommunity has always advocated that *"parents are at the nexus of where broadband intersects with community anchor institutions (K-12, government, health, and social services)"*. Investment in digital literacy in one sector or focused on one constituency, has a multiplying effect for all other sectors, leading to smart, connected communities with broadband literate citizens and a myriad of positive outcomes.

ⁱ Federal Communications Agency (2010) National Broadband Plan: Recommendation 9.13.
<http://www.broadband.gov/plan/9-adoption-and-utilization/?search=clearinghouse#s9-6>

ⁱⁱ Federal Communications Agency. (2010) Community Use of Schools' E-rate Funded Facilities and Services. CC Docket No. 02-6, GN Docket No. 09-51. http://transition.fcc.gov/Daily_Releases/Daily_Business/2010/db1215/DA-10-2356A1.pdf

ⁱⁱⁱ U. S. Department of Education. Title I, Part A of the Elementary and Secondary Education Act, as amended (ESEA). Sec. 1118(e)(2). <http://www2.ed.gov/programs/titleiparta/index.html>

^{iv} U.S. Department of Education. (2011) Promise Neighborhoods.
<http://www2.ed.gov/programs/promiseneighborhoods/index.html>

^v One Economy. (2011) Connect to Complete. <http://connect2compete.org/>

^{vi} Connect Your Community (2012) Digital Literacy Electives (Education).
<http://www.connectcommunity.org/curriculum-center/cyc-curriculum-electives-2/>